

## **EXHIBIT B**

**Maria L. Nixon**

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**From:** Patrick Stockalper  
**Sent:** Monday, October 7, 2024 8:29 AM  
**To:** Thomas Ferlauto; Molshree Gupta  
**Cc:** Arlene King; Philip Cohen; Barbara Ezra; Maria L. Nixon  
**Subject:** RE: (610-2) Assif, Joshua v. County of Los Angeles / Request for W-9s

Tom:

Apologize for the delay in responding but I just got some further info this morning. The matter is expected to be on Board Supervisor agenda for approval in November at the earliest but more likely December.

Thank you and let me know if you have any further questions.

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**From:** Thomas Ferlauto <tmf@lawofficetmf.com>  
**Sent:** Thursday, October 3, 2024 11:47 AM  
**To:** Molshree Gupta <mgupta@kmslegal.com>  
**Cc:** Patrick Stockalper <pstockalper@kmslegal.com>; Arlene King <aking@kmslegal.com>; Philip Cohen <pcohen@pcohenlaw.com>; Barbara Ezra <bezra@kmslegal.com>; Maria L. Nixon <mnixon@kmslegal.com>  
**Subject:** Re: (610-2) Assif, Joshua v. County of Los Angeles / Request for W-9s  
**Importance:** High

Counsel:

Can we get a status on this?

It is October, and your last statement was that funds would be disbursed by month's end.

Thanks,

Tom

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On Aug 7, 2024, at 12:33 PM, Molshree Gupta <[mgupta@kmslegal.com](mailto:mgupta@kmslegal.com)> wrote:

Good afternoon, Counsel:

Apologies for the delay in providing an update on this matter. In candor, Risk Management has been bogged down due to the sheer number of cases requiring CAP/SCAP completion.

However, we are pleased to report that we have received an update in this matter this afternoon as follows:

- The CAP/SCAP is being circulated for final approval this week;
- Thereafter, we will be on an approximate 2-month timeline to complete various Board approvals to proceed with disbursement of settlement funds.

As such, we anticipate that the settlement will be completed and funds disbursed by the end of October 2024.

Thanks,

<image001.jpg>

Molshree Gupta  
Partner  
**KJAR, McKENNA & STOCKALPER, LLP**

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**From:** Thomas Ferlauto <[tmf@lawofficetmf.com](mailto:tmf@lawofficetmf.com)>

**Sent:** Monday, July 8, 2024 4:16 PM

**To:** Molshree Gupta <[mgupta@kmslegal.com](mailto:mgupta@kmslegal.com)>

**Cc:** Patrick Stockalper <[pstockalper@kmslegal.com](mailto:pstockalper@kmslegal.com)>; Arlene King <[aking@kmslegal.com](mailto:aking@kmslegal.com)>; Philip Cohen <[pcohen@pcohenlaw.com](mailto:pcohen@pcohenlaw.com)>; Barbara Ezra <[bezra@kmslegal.com](mailto:bezra@kmslegal.com)>; Maria L. Nixon <[mnixon@kmslegal.com](mailto:mnixon@kmslegal.com)>

**Subject:** Re: (610-2) Assif, Joshua v. County of Los Angeles / Request for W-9s

Counsel:

It has now been 11 months since the settlement agreement was fully executed and delivered, and we cannot even get a straight answer from you as to where in the process the settlement is. This is far beyond what was contemplated when my client agreed to the settlement — approaching twice as long. I do not believe that this process has been pursued in good faith. I believe absolutely nothing was done for the first six months, and there has been nothing but foot dragging since then. If my client is not provided with the settlement proceeds by the anniversary of the delivery of the executed settlement agreement, we will bring an ex parte application to make the Court aware of the situation. We reserve the right to ask the Court to enforce the terms of the settlement and/or to set aside the settlement and demand the matter be reset for the earliest available trial date.

Do not bother thanking me for my patience, because it is at its end.

Sincerely,

Thomas M. Ferlauto

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On Jun 10, 2024, at 11:33 AM, Molshree Gupta <[mgupta@kmslegal.com](mailto:mgupta@kmslegal.com)> wrote:

Good morning:

Thank you for your patience. We have just been advised that, while the process is taking much longer than was originally expected, we are anticipating the completion of review within 3-4 weeks, and then will require an additional 2-3 months to make sure the CAP/SCAP is approved by the two boards (Contact Cities and Board of Supervisor).

Also, just pointing out that the Settlement Agreement states the process “**will take a minimum of 180 days.**”

Thanks again for your patience. We will let you know as soon as we hear anything further from the County.

<image001.jpg>

Molshree Gupta  
Partner  
**KJAR, McKENNA & STOCKALPER, LLP**

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**From:** Thomas Ferlauto <[tmf@lawofficetmf.com](mailto:tmf@lawofficetmf.com)>

**Sent:** Friday, June 7, 2024 12:44 PM

**To:** Molshree Gupta <[mgupta@kmslegal.com](mailto:mgupta@kmslegal.com)>

**Cc:** Patrick Stockalper <[pstockalper@kmslegal.com](mailto:pstockalper@kmslegal.com)>; Arlene King <[aking@kmslegal.com](mailto:aking@kmslegal.com)>; Philip Cohen <[pcohen@pcohenlaw.com](mailto:pcohen@pcohenlaw.com)>; Barbara Ezra <[bezra@kmslegal.com](mailto:bezra@kmslegal.com)>; Maria L. Nixon <[mnixon@kmslegal.com](mailto:mnixon@kmslegal.com)>

**Subject:** Re: (610-2) Assif, Joshua v. County of Los Angeles / Request for W-9s

It is now coming up on ten (10) months since the settlement agreement was fully executed and delivered.

Where exactly are we on the CAP/SCAP process? You indicated that would be approved within six months. We are far beyond that. When will my client be paid what he is owed?

Thanks,

Tom

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On May 3, 2024, at 6:03 PM, Molshree Gupta <[mgupta@kmslegal.com](mailto:mgupta@kmslegal.com)> wrote:

Good afternoon, and thank you for your patience.

As outside counsel, our insight into the process is limited. Based on information and belief, to approve the subject settlement, Defendant COUNTY requires a Corrective Action Plan (CAP) and Summary Corrective Action Plan (SCAP). Preparation of a CAP/SCAP requires comprehensive review of the underlying incident and applicable laws, legal authorities and precedent, policies and procedures, etc.

Based on prior experience with the process, we believed that the settlement approval process, including approval of the CAP/SCAP, may take up to 6 months. However, based on more recent experience, it appears that the settlement approval process, including approval of the CAP/SCAP, may take 9-12 months for settlement sums as large as the one in this action.

That being said, once the settlement is approved by Defendant COUNTY, it can disburse the settlement funds to Plaintiff quickly to allow for a dismissal to be filed.

Thanks,

<image001.jpg>

Molshree Gupta

Partner

**KJAR, McKENNA & STOCKALPER, LLP**